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March 20, 2023

Via PACER

Hon. John Michael Vazquez, U.S.D.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Federal Building
50 Walnut Street
Newark, NJ 07101

Re: Wilmington Trust, N.A. As Trustee For The Benefit Of The Registered Holders Of Wells Fargo Commercial Mortgage Trust 2019-C50, Commercial Mortgage Pass-Through Certificates, Series 2019-C50 (the “Lender”) v. 24 Commerce Street, LLC (the “Borrower”), et al., relating to property located at 24 Commerce Street, Newark, New Jersey (the “Property”) Civil Action No. 2:21-05498

Dear Judge Vazquez:

The Undersigned represents 24 Commerce Street, LLC in the above matter. Please accept this correspondence in response to that of the Receiver of March 9, 2023.

While Defendant understands that this Court entered partial summary judgment on March 15, 2023, entering a judgment for foreclosure in favor of Plaintiff, while denying Plaintiff’s motion as to damages, and alluding to a forthcoming hearing on damages, Defendant has requested a pay-off letter from the Receiver, as Defendant is interested in redeeming the subject property.

I understand that the Receiver complains of difficulties working with Defendant’s management company in the past, but pending any foreclosure sale and/or redemption of the subject property, I respectfully submit that the Receiver is free to advise me of any difficulties engaging Defendant’s management company in the future.

Should any further issues arise as to alleged delays arising from the operation of Defendant’s management company, I am confident that I could assist to remedy any such

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alleged delays or lack of response if the Receiver simply advises me of same. I would imagine that such an approach would be far less burdensome than the Receiver attempting to serve as a management company for the Subject Property, and I am always happy to communicate with the Receiver as to all aspects of this matter and the related matters.

I thus respectfully ask that this Court deny the Receiver's application and suggest this simpler alternative.

Thank you for Your Honor's attention.

Respectfully submitted,

/s/ Eric J. Warner

Eric J. Warner, Esq.

Cc: Counsel of Record (Via PACER)